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8 Attorney for Proposed Intervenors

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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **WESTERN DIVISION—LOS ANGELES**

13 YITZCHOK FRANKEL;) Case No. 2:24-cv-04702-MCS-
14 JOSHUA GHAYOUM;)
15 EDEN SHEMUELIAN, and)
16 DR. KAMRAN SHAMSA)
17 Plaintiffs,)
18)
19 vs.)
20)
21)
22)
23)
24)
25)

26 REGENTS OF THE UNIVERSITY OF) **DECLARATION OF THOMAS**
27 CALIFORNIA; MICHAEL V. DRAKE,) **HARVEY IN SUPPORT OF**
28 President of the University of California;) **MOTION FOR LEAVE TO**
29 GENE D. BLOCK, Chancellor, University) **INTERVENE**
30 of California, Los Angeles; DARNELL)
31 HUNT, Executive Vice-President and)
32 Provost; MICHAEL BECK,)
33 Administrative Vice Chancellor;)
34 MONROE GORDEN, JR., Vice)
35 Chancellor; and RICK BRAZIEL,)
36 Assistant Vice Chancellor, each in both)
37 his official and personal capacities,) **Judge: Hon. Mark C. Scarsi**
38)
39 Defendants.)
40)
41)

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2 **DECLARATION OF THOMAS B. HARVEY**

3 I, Thomas B. Harvey, declare as follows pursuant to 28 U.S.C. § 1746 under
4 penalty of perjury:

5 1. I am an attorney at law duly licensed to practice before all courts in the
6 State of California and am a member of the bar of this Court. If called upon to do so,
7 I could and would testify competently to the following based on firsthand knowledge.

8 2. I met with Counsel for Plaintiffs on April 24, 2025 by phone. We were
9 not able to resolve the issues raised in Proposed Intervenors' Motion for Leave to
10 Intervene. After exchanging emails following up on our conversation, Counsel
11 informed me that Plaintiffs oppose intervention.

12 3. I met with Counsel for Defendants on April 25, 2025 by phone. We were
13 not able to resolve the issues raised in Proposed Intervenors' Motion for Leave to
14 Intervene. After exchanging emails following up on our conversation, Counsel
15 informed me that Defendants take no position on intervention.

16 4. Both Counsel for Defendants and Counsel for Plaintiffs agreed to the
17 following briefing schedule in anticipation of a hearing date of June 30, 2025, at 9:00
18 AM on Proposed Intervenors' Motion for Leave to Intervene:

19 a. Proposed Intervenor's motion: 5/2/25
20 b. Plaintiffs' and Defendants' Opposition: 5/20/25
21 c. Proposed Intervenor's reply: 6/2/25
22 d. Hearing date 6/30/25

23 I declare under penalty of perjury under the laws of the United States that the
24 foregoing is true and correct. Executed this 2nd day of May, 2025, at Los Angeles,
25 California.

26 /s/Thomas B. Harvey

27 Thomas B. Harvey